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10 The Honorable Lauren King  
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13 IN THE UNITED STATES DISTRICT COURT  
14 WESTERN DISTRICT OF WASHINGTON  
15 AT SEATTLE

16 ABDIQAFAR WAGAFE, *et al.*, on behalf of  
17 himself and other similarly situated,

18 Plaintiffs,

19 v.  
20

21 JOSEPH R. BIDEN, President of the United  
22 States, *et al.*,

23 Defendants.

24 CASE NO. 2:17-cv-00094-LK

25 **STIPULATION FOR EXTENSION  
26 OF TIME TO RESPOND TO  
27 COURT ORDER; ORDER  
THEREON**

28 WHEREAS on January 31, 2022, the Court issued an order striking 17 pending motions to  
seal documents or seeking leave to file materials as “highly sensitive documents” (Dkt. No. 587);  
and

WHEREAS the Court further directed the parties to file, by March 29, 2022, “(1) a joint  
statement concisely consolidating their positions on the materials they want sealed; and (2) an  
updated Joint Status Report” (Dkt. No. 587); and

WHEREAS the March 29, 2022 deadline imposed by the Court will not be affected by the  
stipulated stay of litigation recently filed by the parties (per paragraph 11 of Dkt. No. 589), if  
adopted by the Court; and

STIPULATION FOR EXTENSION OF TIME TO RESPOND  
TO COURT ORDER; ORDER THEREON - 1  
(Case No. C17-00094LK)

UNITED STATES DEPARTMENT OF JUSTICE  
CIVIL DIVISION, OFFICE OF IMMIGRATION LITIGATION  
Ben Franklin Station, P.O. Box 878  
Washington, D.C. 20044  
(202) 616-4900

1        WHEREAS the 17 motions stricken by the Court involve more than 150 individual  
2 documents that Defendants have sought to seal in part or in full or treat as “highly sensitive  
3 documents;” and

4        WHEREAS the parties have conferred preliminarily to discuss the schedule for completing  
5 their review and assessment of the documents at issue, for meeting and conferring to discuss their  
6 respective positions in an effort to identify areas of agreement, and for drafting their joint response  
7 to the Court’s order; and

8        WHEREAS the Court’s Order will require Defendants to undertake a detailed review of each  
9 of the more than 150 documents totaling thousands of pages at issue, to assess whether revision of  
10 their position on any of the documents being sealed or treated as “highly sensitive” would be  
11 appropriate, and to prepare revised versions of any documents as to which Defendants do change  
12 their position; and

13        WHEREAS Defendants do not believe they will be able to complete the work necessary to  
14 jointly respond to the Court’s order by March 29, 2022; and

15        WHEREAS Defendants are confident that an additional three weeks, until April 19, 2022,  
16 would provide them with sufficient time in which to respond to the Court’s order, including a  
17 meaningful opportunity to meet and confer in an effort to narrow the documents, or portions of  
18 documents, in dispute, and Plaintiffs’ having no objection to the extension;

19        NOW THEREFORE, the parties, through their respective counsel of record do hereby  
20 stipulate and agree that the Court may make and enter the following order:

21  
22              The deadline for submitting the parties’ joint response to the Court’s order striking 17  
23 pending motions to seal or seeking leave to file “highly sensitive documents” (Dkt. No. 587)  
24 and Joint Status Update shall be extended by 21 days, until April 19, 2022.

25        ///

26        ///

27        ///

28        STIPULATION FOR EXTENSION OF TIME TO RESPOND  
TO COURT ORDER; ORDER THEREON - 2  
(Case No. C17-00094LK)

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1 SO STIPULATED.

DATED: February 18, 2022

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1           **SO STIPULATED.**

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*Counsel for Plaintiffs*

## ORDER

IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2022

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**LAUREN KING**  
United States District Judge

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/EFC system, which will send notification of such filing to all counsel of record.

/s/ Lindsay M. Murphy  
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